SOUTHERN DISTRICT OF NEW YORK	<u> </u>
In re:) Chapter 11
PURDUE PHARMA L.P., et al.,1) Case No. 19-23649 (RDD)
Debtors.) Jointly Administered
Debtors.) Jointly Administered

UNITED STATES BANKRUPTCY COURT

THIRD SUPPLEMENTAL DECLARATION OF LEON SZLEZINGER IN SUPPORT OF EMPLOYMENT OF JEFFERIES LLC AS INVESTMENT BANKER TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS

- I, Leon Szlezinger, hereby declare under penalty of perjury that, to the best of my knowledge and belief, and after reasonable inquiry, the following is true and correct:
- 1. I am a Managing Director and Joint Global Head of Restructuring & Recapitalization at Jefferies LLC ("<u>Jefferies</u>"), an investment banking and financial advisory firm with principal offices located at 520 Madison Avenue, New York, New York 10022, as well as at other locations worldwide.
- 2. I submit this third supplemental declaration in support of Jefferies' employment as investment banker to the Official Committee of Unsecured Creditors (the "Committee") of Purdue Pharma L.P., *et al.* (collectively, the "Debtors"). I have personal knowledge of the matters set forth herein.²

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

² Certain of the disclosures herein relate to matters within the knowledge of other professionals at Jefferies.

- 3. On November 5, 2019, the Committee filed an application to employ and retain Jefferies as its investment banker under sections 328(a) and 1103(a) of the Bankruptcy Code, *nunc pro tunc* to October 4, 2019, pursuant to the terms and subject to the conditions of the engagement letter between Jefferies and the Committee dated as of October 4, 2019 [Docket No. 425] (the "Application"). On November 21, 2019, the Court entered the order granting the Application [Docket No. 526].
- 4. In connection with the Application, I submitted a declaration (the "Initial Declaration") describing Jefferies' connections with the Debtors and other Potential Parties in Interest. The Initial Declaration was attached to the Application as Exhibit C. Subsequently, on February 24, 2020 [Docket No. 871] and July 22, 2020 [Docket No. 1494], I submitted supplemental declarations providing additional disclosures.
- 5. On October 27, 2020, the United States Trustee for Region 3 appointed an Official Committee of Opioid-Related Claimants (the "Mallinckrodt Opioid Committee") in the chapter 11 cases of Mallinckrodt plc and its affiliated debtors (the "Mallinckrodt Debtors"), which cases are pending before the United States Bankruptcy Court for the District of Delaware. *See Notice of Appointment of Opioid Related Claimants, In re Mallinckrodt plc, et al.*, Case No. 20-12522 (JTD) (Bankr. D. Del. Oct. 27, 2020) [ECF No. 308]. The Mallinckrodt Debtors include multiple entities that were named as co-defendants with the Debtors in various prepetition lawsuits arising from the opioid crisis, and such entities may hold contingent common law contribution claims against the Debtors. In addition, the Debtors may hold contingent common law contribution claims against the Mallinckrodt Debtors.
- 6. The Mallinckrodt Opioid Committee has selected Jefferies as its investment banker, effective as of October 28, 2020, pending court approval. Jefferies is currently engaged in conflict

19-23649-shl Doc 1903 Filed 11/06/20 Entered 11/06/20 12:56:49 Main Document

Pa 3 of 3

checks and anticipates filing an application to be retained by the Mallinckrodt Opioid Committee

in the near future. For the avoidance of doubt, Jefferies does not provide services to any

Mallinckrodt Debtor in respect of the Debtors' chapter 11 cases. In addition, in the Debtors'

chapter 11 cases, Jefferies will abstain from being involved in any issues regarding Mallinckrodt's

claims (if any) against the Debtors. In the Mallinckrodt chapter 11 cases, Jefferies will abstain

from being involved in any issues regarding the Debtors' claims (if any) against Mallinckrodt.

7. Counsel to the Debtors in these cases has been notified that Jefferies has been

selected as the investment banker to the Mallinckrodt Opioid Committee. Additionally, counsel to

the debtors in the Mallinckrodt cases has been made aware that Jefferies is retained as investment

banker to the Committee.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the

foregoing is true and correct.

Dated: November 6, 2020

New York, New York

JEFFERIES LLC

/s/ Leon Szlezinger

Leon Szlezinger

Managing Director

3